

# **EXHIBIT 1**

**Plaintiffs' More Definite Statement as to Defendant  
National Bank of Kuwait**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849.

***Organizational Structure and Purpose of National Bank of Kuwait***

1. National Bank of Kuwait was founded in 1982.
2. National Bank of Kuwait has been conducting business in the United States since 1984 through offices located at its branch in New York City at the following address: 299 Park Avenue, New York, New York 10171.
3. According to BBC Business, National Bank of Kuwait is a leading financial institution in the Gulf.
4. National Bank of Kuwait is the Arab lender with the highest credit rating.
5. In September 2004, National Bank of Kuwait agreed to buy the Credit Bank of Iraq, the first foreign purchase of an Iraqi lender in the last forty years.
6. In 1981, half-a-million dollars had been sent by Banca del Gottardo in Lugano, Switzerland ("Gottardo," the "Satan" account) to Hamid Al-Tikriti's Kuwaiti bank account at National Bank of Kuwait.
7. A 1983 document shows \$1 million transferred from the account of Banco del Gottardo "Satan" to Hamid al-Tikriti's account at the National Bank of Kuwait. The recipient -- Abid Hamid Mahmoud Al-Tikriti -- was Saddam's presidential secretary and cousin, arrested by the United States in June 2003.
8. In 1981, half-a-million dollars had been sent by Banco del Gottardo to Hamid

Mahmoud Al-Tikriti's Kuwaiti bank account at National Bank of Kuwait.

9. Banco del Gottardo moved al-Qaeda money via the Al Taqwa bank, a shell bank that operated through correspondent accounts at the Gottardo branch in Nassau. It also handled payments for the Saddam money network.

10. Banco del Gottardo is heavily overlapped with the Bank Al Taqwa.

11. On November 7, 2001, President Bush said that the Specially Designated Global Terrorist (SDGT) Bank Al Taqwa network was raising, managing and distributing money for al Qaeda under the guise of a legitimate banking business activity. The administration then froze the assets of several companies linked to the bank.